

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MELINDA SERIN, JUDSON RUSS, LONG SOU
LIM, PERI KETTLER, GORDON REDNER, and
THOMAS J. SMITH,

Plaintiffs,

- against -

NORTHERN LEASING SYSTEMS, INC., JAY
COHEN, RICH HAHN, and SARA KRIEGER,

Defendants.
-----X

:
:
: Index No.: 06 CV 1625 (SCR)
:
:

: DECLARATION OF
: H. RAJAN SHARMA
:
:
:
:
:

HIMANSHU RAJAN SHARMA, being an attorney duly licensed to practice in the State of New York and admitted to this court, hereby affirms and states under penalty of perjury as follows:

1. I am the principal of the Law Offices of H. Rajan Sharma, Esq. and was retained to assist the law firm of Chittur & Associates, P.C. , counsel for Plaintiffs in the above-captioned action, in prosecuting this case against Northern Leasing Systems, Inc. (“NLS”). I am familiar with the facts and circumstances of this case and respectfully submit this affirmation in support of the application for an award of attorneys’ fees by counsel for Plaintiffs.

2. I have been a licensed attorney in private practice since 1997 and was previously an associate at the law firm of Goodkind Labaton Rudoff & Sucharow, LLP. I was a senior attorney at the law firm of McCallion & Associates, LLP until 2003. Over the years, I have served as counsel including as lead counsel in a number of complex and class action litigation matters in the federal courts. For example, I was an attorney at the lead counsel firm for plaintiffs in *Bodner er al. v. Banque Paribas et al.*, a major Holocaust-era class action litigation

against a dozen French banks for illegal wartime confiscation of assets, the only such litigation to result in a favorable judicial decision on the merits. I served as class counsel for a certified class of more than three thousand plaintiffs in international litigation involving a sovereign debt offering, *Poddar et al. v. State Bank of India*, as well as co-lead counsel in an environmental class action litigation, *Sahu et al. v. Union Carbide Corp.*, pending in the Southern District of New York.

3. Attached hereto is a true and correct copy of a printout of attorney time and billing generated by my computerized time-keeping system, Timeslips version 11.0 (“Timeslips”). The slips are limited to attorney time spent on the Serin litigation, motion practice, legal research and drafting in the above-captioned action. According to my firm’s Timeslips records, my firm has incurred attorneys’ fees in the amount of \$20,450.50 for approximately 58.43 hours spent in the litigation of this action together with Chittur & Associates from June 2007 to January of 2009.

4. My firm’s standard hourly billing rate is \$350 based on prevailing market rates in the Southern District of New York for attorneys of comparable experience, 13 years, with a background in complex litigation and class action matters. This is the standard rate that my firm charges to clients whose fee arrangements provide for billing on an hourly basis. I have been awarded attorneys’ fees at the rate of \$350 per hour in two actions in the Southern District of New York including a class action settlement.

5. The time sheets generated by my computerized system are contemporaneous records, organized in chronological order from the earliest to the most recent. Each “slip” or billing item identifies the time spent in units corresponding to an hour so that time billed as 0.50, for example, means thirty minutes. Each slip is individually identified by a number, with the

6. Each slip reflects the date on which work was performed, the attorney performing the work, the time spent and a brief description of the work performed and a “slip value” which is the amount to be billed for the time spent performing the work.

Dated: December 30, 2010

Respectfully submitted,

/S/

H. Rajan Sharma